



4. OIP conducted a keyword-based search for records and released non-exempt portions of responsive records in two releases, on March 1, 2018 and April 4, 2018.

5. On June 12, 2018, Plaintiff and OIP reached an agreement to resolve certain issues in dispute in this litigation, pursuant to which, among other things, OIP agreed to conduct a narrowed search for certain records.

6. OIP completed the agreed-upon narrow search on July 24, 2018.

7. On October 16, 2018, OIP made a supplemental release of non-exempt portions of responsive records.

8. The parties have reached a settlement in principle on Plaintiff's request for attorney's fees, subject to final approval of the settlement terms. The parties require additional time to finalize approval of the settlement terms and execute a final settlement agreement.

9. Accordingly, the parties respectfully request that they file another Joint Status Report on or before June 7, 2019.

Dated: May 6, 2019

Respectfully submitted,

/s/ Laurence Schwartztol  
JUSTIN FLORENCE (DC Bar No. 988953)  
LAURENCE SCHWARTZTOL  
The Protect Democracy Project, Inc.  
2020 Pennsylvania Ave., NW #163  
Washington, DC 20006  
Telephone: (202) 599-0466  
Fax: (929) 777-8428

*Attorneys for Plaintiff*

JOSEPH H. HUNT  
Assistant Attorney General

ELIZABETH J. SHAPIRO  
Deputy Branch Director

/s/ Chetan A. Patil  
CHETAN A. PATIL  
Trial Attorney (DC Bar No. 999948)  
United States Department of Justice  
Civil Division  
Federal Programs Branch  
P.O. Box No. 883  
Ben Franklin Station  
Washington, DC 20044  
Telephone: (202) 305-4968  
Fax: (202) 616-8470  
[chetan.patil@usdoj.gov](mailto:chetan.patil@usdoj.gov)

*Attorneys for Defendants*